



Homeland
Security

April 8, 2019

Larry Schwartztol
Counsel
The Protect Democracy Project
2020 Pennsylvania Avenue, NW #163
Washington, DC 20006

Re: Protect Democracy Project
17-cv-02202 (2017-HQFO-01153/2018-HQLI-00008)
6th Interim Release

Dear Mr. Schwartztol:

This is the fifth interim response to your August 23, 2017, Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS) (2017-HQFO-01153).

For this month's production, DHS processed for release 609 pages. Of the 609 pages, 15 pages are released in full, 305 pages are withheld in full pursuant to 5 U.S.C 552(b)(5) and 290 pages were marked as duplicate. The 319 pages that are released to you are bates-numbered DHS-001-1153-01799 to DHS-001-1153-02117.

Sincerely,

A handwritten signature in cursive script that reads "Bradley E. White".

Bradley E. White
Acting, Director FOIA Litigation

Enclosure

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CIVIL RIGHTS AND CIVIL LIBERTIES PRINCIPLES FOR DHS INTELLIGENCE PRODUCTS

Version 1.0 (September 19, 2014)

This guidance articulates a set of general principles to promote the protection of civil rights and civil liberties by the U.S. Department of Homeland Security (DHS) as DHS personnel craft intelligence products. When Department analysts write or review products, they should apply the principles below. The principles apply not only to the products reviewed or cleared by the Office for Civil Rights and Civil Liberties (CRCL) but to *all* products, whether produced by the Intelligence & Analysis Directorate (I&A) or a DHS Component, and whether subject to CRCL clearance or not. This includes, for example, products shared only with other IC partners, classified and unclassified products, and products drafted or promulgated by Components with or without headquarters involvement.

The guidance presents eight civil rights/civil liberties principles, describing each one, identifying areas of particular concern or application, and providing one or more examples of product texts that do not sufficiently respect the principle and how they can be rewritten to solve the problem. For a number of the principles, the examples are followed by a list of “hot-button” terms that often give rise to concern. These principles are not an exhaustive list of every civil rights/civil liberties concern that may arise in any given product, but do highlight common issues CRCL has observed. Where and how a civil rights and civil liberties issues may arise, however, is fact specific. Analysts should use the principles and the guidance as instructive but not a checklist of concerns. Analysts should be careful when crafting any product that may touch on individual liberties or focus on individuals as a result of their race, ethnicity, or religion. In situations where analysts have questions or concerns on how best to approach a topic that may touch on these issues, they should feel free to contact CRCL for specific guidance on crafting their product.

1. **The Violence Principle:** Generally, reporting should focus on violence or criminality of a particular individual or group in order to avoid First Amendment concerns.
2. **The No-Aspersions Principle:** Reporting should present analysis of political, religious, or ideological speech or activity neutrally and without negative characterizations. In some cases, reporting on these types of activity may be improper, unless it relates to violence or criminality.
3. **The Equality Principle:** Reporting should provide a full, objective analysis of a particular threat and should not be based on race, ethnicity, or religion—or appear to be so based.
4. **The Due Process Principle:** Reporting should separate allegations of crime from determinations of guilt.
5. **The Religious Debate Principle:** Reporting should avoid taking part in religious debates, (e.g., by using religious terms that carry multiple meanings or are subject to interpretation).
6. **The Guilt-By-Association Principle:** Reporting should not implicate many individuals in the bad conduct of an individual or a small number of individuals.
7. **The Clarity-Of-Source Principle:** Reporting should accurately characterize and separate sources’ facts or conclusions from DHS analytic judgments.
8. **The Anti-Conveyor Belt Principle:** Civil rights issues are not cured by attribution to another agency or source.

Staff at CRCL are available to any Component or Office across the Department for consultation and training, and Components and Offices are encouraged to send draft products for CRCL feedback to any of the CRCL Product Review mailboxes available on each of the three networks: unclassified (A-LAN), secret (HSDN/B-LAN), or top secret/SCI (JWICS/C-LAN).

1. THE VIOLENCE PRINCIPLE: REPORTING SHOULD FOCUS ON VIOLENCE/CRIMINALITY, TO AVOID FIRST AMENDMENT CONCERNS

Generally, reporting should be about the violence or criminality of particular individuals or groups.¹ Reporting on activities lacking a nexus to violence or criminal activity² is generally inappropriate.

Reporting on groups or individuals is appropriate where the product expressly and clearly articulates the nexus to violent or other criminal activity. For instance, it may be appropriate to report on an organization that engages in violent or other criminal activities, or on a group that facilitates violence by providing material support to an organization involved in known criminal activities, including a designated Foreign Terrorist Organization.

In addition, when assessing the potential for violence or other criminal activity in the future (e.g. violence that may be planned but has not yet been carried out) by an individual or group, it is appropriate to include examples of past violent or criminal activity. A predictive report should include relevant information to establish a well-supported and reasonable threat of violent or other criminal activity by an individual group, and the report must clearly support the assessment and appropriately characterize the reliability of supporting information.

If a product discusses First Amendment protected activity (speech, press, religion, association, and ideology or beliefs), it must expressly state a nexus between the reported protected activity and a violent or other criminal activity or well-supported threat. For instance, include relevant background information to establish the linkage between the individual or group who is the subject of the report and violent or other criminal activity. Analysts should avoid analysis or presentation of elements of that activity without the appropriate context (e.g. by describing political, religious, or ideological speech or activity in a footnote or text box that does not also provide the context indicating why the reporting is appropriate).

¹ As used in this guidance, the term “groups” includes organizations of all types (i.e., private, nonprofit, for profit).

² All references to “violent or other criminal activity” in this guidance presume investigation of and/or reporting on the activity in question is also within the scope of an appropriate DHS mission.

Special issues:

- **Websites:** Viewing information contained on a website is generally protected under the First Amendment even if the website promotes (or users of the website promote) criminal or violent activities. Visitors to these websites may be journalists, students, government officials, and the general public conducting legitimate research or browsing. Accordingly, the act of viewing a website is not alone sufficient to justify reporting on any person. Taking additional steps in furtherance of a crime or violent activity that is advocated on a website is, however, not protected and may be the subject of a report.

Characterization of a website is also a topic of concern. If the entire website is dedicated to the transmission of terrorist information, the term “terrorist website” may be appropriate. When discussing websites with mixed uses (i.e., some content addresses non-violent, First-Amendment-protected activities, while other content on the same site advocates violence or criminal activity), focus only on the content facilitating or supporting violence or terrorism; avoid broadly implicating all users of the website in the conduct of a few users. (See the *Guilt by Association Principle*, below.)

- **Support.** Do not state that an individual “supports” or is a “supporter” of a terrorist or violent extremist organization or lone offender without explaining the nature and extent of the support. If using the term “support” in the context of “material support” as that term is defined in 18 U.S.C. § 2339A, consult with the Office of the General Counsel (OGC) to ensure that the conduct described falls within the scope of that statute.
- **Schools.** When a school is within the United States, its educational activities are protected under the First Amendment. A *madrassa* is a Muslim school, college, or university that may be associated with a mosque. Reporting on activities at a madrassa or other school is appropriate only if credible sources reveal that a particular school may, for example, be indoctrinating its students in violent or criminal teachings. The facts and citations supporting this assertion must be provided in the product.

However, there may be situations where it is appropriate to report on individuals or groups that are *not* directly involved in violent or other criminal activity. These situations may include:

- **Recruitment.** It is appropriate to discuss information indicating that a person or group *has attempted or is attempting* to recruit a specific individual or group to assist them in violent or other criminal activities (e.g., recruitment of an individual with a background in explosives) as long as the report provides all known information, or identifies information gaps, about the attempted recruitment. Products containing this type of analysis should include a full discussion of the basis for believing an individual or group may be targeted in this manner to make clear that the interest in the individual or group is based on attempts to recruit them for violent or criminal activity, as opposed to monitoring them for non-nefarious (and consequently protected) associations.
 - It is appropriate to report on an individual’s fundraising or recruitment activities only if we can reasonably establish that the individual engaged in these activities with knowledge of and the intent to support the illegal goals³ of the group.

³ This standard is higher than the standard required for conviction for material support to terrorism under 18 U.S.C. 2239B in order to ensure protection of the constitutional rights of those engaged in a wide range of activities

- The propriety of reporting on a group's recruiting, fundraising, or other First Amendment activities is greatly enhanced if the U.S. government has publically indicated that the organization is connected to terrorism. Even in these situations, the product should contain enough information so that the reader understands the connection.
- **Targets.** Individuals or groups may be targeted as victims or potential victims for violent or other criminal acts. In this case, it is particularly important to characterize those individuals or groups appropriately and avoid reporting on information other than information relevant to their potential status as victims.
- **Witnesses.** A product may include information about an individual who has witnessed violent or other criminal acts. As with targets, it is important to accurately characterize these individuals and limit reporting appropriately.
- **Providing context.** Reporting provided for context may also be acceptable, but this type of reporting must be clear and distinct from judgments about violent or other criminal behavior.
- **Public safety/situational awareness.** Reporting provided for "situational awareness" may also be acceptable even where the individual, group or activity has no nexus to violence or criminality, but only where the reporting is appropriately tailored to provide the information necessary for a specific, appropriate government purpose or mission, and also where distribution is only to those who need that information to accomplish that specific purpose/mission. For example, reporting the fact that a non-violent, lawful demonstration (protected activity under the First Amendment) is planned outside a particular federal building at a particular time may be appropriate for the purpose of situational awareness if distributed only to personnel at that building and individuals (such as local FPS personnel and/or the local police department) with public safety jurisdiction over that area. A product shared more broadly on this protected activity (e.g. to other personnel at other federal buildings, or national FPS personnel) or including more information than the minimum necessary for situational awareness of the activity (e.g. an analysis of the ideological leanings of the demonstrating group), is inappropriate.

This is not an exhaustive list. Analysts are also encouraged to contact CRCL to discuss proposed reporting of this type to help determine whether such a report may be appropriate.

protected by the First Amendment right to free association. This policy protection is necessary to ensure appropriate internal DHS scrutiny on reporting of acts that could be viewed as lending unwitting support to terrorist actors or groups. For instance, an individual giving to a charity which, unbeknownst to him supports terrorism, could be treated as material support. Where a product would report or analyze activities that may provide material support to terrorism, and it is not clear what the intent of the activities was, CRCL would work with I&A on a case-by-case basis to ensure propriety under Constitutional and DHS policy standards.

The Violence Principle in Action: Sample Problems and Solutions

<u>Problems: Original Texts</u>	<u>Solutions: Revised Texts</u>
Recruitment (U//FOUO) Request for Information Concerning Fund-Raising and Recruitment within Libyan, Egyptian, Yemeni, or Tunisian Communities.	(U//FOUO) Request for Information Concerning Fund-Raising and Recruitment for Violent, Armed Militant or Revolutionary Groups in Libya, Egypt, Yemen, or Tunisia.
Context: (U//FOUO) Militia members typically adhere to extreme anti-government belief systems that oppose most federal and state laws, regulations, and authority. Many members combine their anti-government beliefs with various conspiracy theories. They tout the existence of a despotic “New World Order” and cite religious apocalyptic/end times beliefs to support their outlook. Individuals within the movement believe militias are the last line of defense against a federal government they see as increasingly eroding citizens’ personal rights, property rights, and the right to own firearms... Some members also embrace other extremist ideologies, such as sovereign citizen and white supremacist beliefs. Factional militia extremist cells and lone individuals carry out anti-government attacks under the militia extremist movement’s philosophy of lone offenders and leaderless resistance.”	(U//FOUO) Violent militia extremists share the overall militia movement’s adherence to anti-government belief systems that oppose most federal and state laws, regulations, and authority. Violent militia extremists have been known to adopt other anti-government belief systems found in the violent sovereign citizen and white supremacist extremist movements. Some factional militia cells or lone individuals carry out anti-government attacks under the philosophy of leaderless resistance.... Violent militia extremists, like many other militia members, combine their anti-government beliefs with various conspiracy theories.... Individuals within both the non-violent elements of the militia movement and the more violent extremist minority believe that militias are the last line of defense in protecting the U.S. Constitutional freedoms against a federal government that they see as increasingly eroding citizens’ personal rights, property rights, and the right to own firearms.
Public Safety (U//FOUO) I&A does not have any specific threat information related to “International Judge the Koran Day.” Nevertheless, we remain concerned that any anticipated or actual destruction of the Quran could result in violence in the Homeland, particularly if the event is widely publicized. High profile perceived desecrations of the Quran or depictions of the Prophet Mohammad have resulted in violence worldwide as well as threats against specific targeted individuals.	(U//FOUO) I&A does not have any specific threat information related to “International Judge the Koran Day.” Nevertheless, we remain concerned that any anticipated or actual destruction of the Quran could result in instances of violence as well as threats and attacks on American Muslims and their places of worship, particularly if the event is widely publicized.

Hot-button terms (use suggests that the product should be evaluated for compliance with this principle):

- “beliefs,” “believes,” “ideas,” “ideals,” “ideology,” “thought”
- “speech,” “expression,” “message”
- “opposition,” “support”
- “recruit,” “recruiting,” “recruitment”
- “fundraising”
- “propaganda”
- “website,” “blog,” “social networking site”
- “madrassa” (variants include madrassah,” “madrasah”)

2. THE NO-ASPERSIONS PRINCIPLE: DO NOT CAST ASPERSIONS ON RELIGIOUS, IDEOLOGICAL, OR POLITICAL SPEECH OR ACTIVITY, UNLESS IT CROSSES THE LINE INTO VIOLENCE OR OTHER CRIMINAL ACTIVITY.

Under the Violence Principle, reporting on political, religious, or ideological speech is often inappropriate. But even when such reporting is appropriate, the U.S. government should not cast aspersions on any religious, ideological, or political speech or activity, unless there is a nexus to violence or other criminal activity.

Thus, even where reporting of non-violent speech, religion, or ideology is appropriate, products should present an analysis that is neutral, without negative characterizations. For example, calling views “extreme,” “militant,” “anti-government,” or “radical” is a negative characterization of protected speech and should be avoided unless there is a nexus to violence or criminal activity.

Avoid using the terms “right wing extremist” or “left wing extremist”; products using these terms are likely to be interpreted as attacks on members of the left or right side of the political spectrum regardless of their connection to violence or other criminal activities. Instead of using these terms, expressly state the group’s or individual’s behavior that reflects facilitation or engagement in acts of violence or other criminal activity.

Likewise, avoid using the term “anti-government” to describe groups and organizations, because it tends to read as a criticism and the First Amendment protects anti-government sentiment. Instead, first determine whether a term that more specifically describes the group is contained in the I&A *Domestic Terrorism and Homegrown Violent Extremism Lexicon* (10 Nov. 2011). If a more specific term is contained in the lexicon, and the group has engaged in conduct that meets the lexicon definition, that term and definition should be used as long as the product includes sufficient factual support for using it. The use of a term and definition from the lexicon is not a substitute for describing what the particular group has done to bring itself within the definition of the term.

Even if an applicable term more specific than “anti-government” is not contained in the lexicon, the term “anti-government” should be avoided in favor of a discussion of the specific violent or other criminal activity that is attributable to the group or its individual members. As always, the analyst must describe the DHS mission nexus for labeling the group or organization in a particular manner.

The No-Aspersions Principle in Action: Sample Problems and Solutions

<u>Problem: Original Text</u>	<u>Solution: Revised Text</u>
(U//FOUO) Indicators of suspicious activity at firearm shops and ranges include unusual comments made regarding anti-US, radical theology, vague or cryptic warnings;”	(U//FOUO) Indicators of suspicious activity at firearm shops and ranges include vague or cryptic warnings that are violent in nature, statements that appear to condone violence against ethnic groups or governments, statements focused on committing violent acts in support of a particular ideology, or statements focused on committing acts of violence against the U.S. government.

Hot-button terms (use suggests that the product should be evaluated for compliance with this principle):

- “extreme,” “extremist,” “right-wing extremist,” “left-wing extremist”
- “militant”
- “anti-government”
- “radical”

3. THE *EQUALITY PRINCIPLE*: DEGREE OF INTEREST (OR INTENSITY OF REPORTING) SHOULD NOT BE BASED ON RACE, ETHNICITY, OR RELIGION—OR APPEAR TO BE SO BASED.

The Equality Principle protects civil rights by eliminating discrimination and its appearance, and supports strong analytical tradecraft by helping ensure objective analysis.⁴

Information must be presented in such a way that it does not focus—or appear to focus—unequal attention on particular individuals or groups due to their race, ethnicity, or religion or belief system. Of course, if a threat picture reveals that only one group or its individual members pose a threat, that can be discussed. But if, for example, *multiple* groups or organizations or their individual members may pose an actual or potential threat, be sure to treat similarly situated individuals, groups, and organizations in an even-handed fashion. Focusing without clear justification on some individuals or groups and not others, especially where discussing groups or individuals that share a particular ethnicity, religion, or belief system, is unequal and inappropriate. Include all relevant information to adequately characterize the nature of a threat and the confidence in any analytic judgment.⁵

⁴ See, e.g. Intelligence Community Directive (ICD) 203, *Analytic Standards*, which lists “Objectivity” as one of the IC Analytic Standards, requiring “that analysts and managers perform their analytical and informational functions from an unbiased perspective. Analysis should be free of emotional content, give due regard to alternative perspectives and contrary reporting, and acknowledge developments that necessitate adjustments to analytic judgments.”

⁵ This is also consistent with ICD 203, which states: “Analytic products should accurately characterize the information in the underlying sources and explain which information proved key to analytic judgments and why.” It also states that analytic products should indicate “both the level of confidence in analytic judgments and explain the basis for ascribing it.”

The Equality Principle in Action: Sample Problems and Solutions

<u>Problem: Original Text</u>	<u>Solution: Revised Text</u>
(U//FOUO) Unaffiliated hackers invoking Islam to justify their actions already conduct low-level cyber attacks, such as defacing web pages that they deem anti-Islamic or propagating nuisance-level viruses.”	(U//FOUO) Unaffiliated hackers – including violent environmental extremists, violent animal rights extremists, and individuals who invoke Islam to justify their actions, as well as others – already conduct low-level cyber attacks, such as defacing web pages or propagating nuisance-level viruses.

4. THE DUE PROCESS PRINCIPLE: SEPARATE ALLEGATIONS OF CRIME FROM DETERMINATIONS OF GUILT

Until criminal suspects are convicted of a crime, their involvement in a crime is only an allegation. No matter how much evidence may exist, even if the suspect has been arrested, indicted or has confessed, the suspect has still only allegedly committed the crime. (For example, a confession may be suppressed because of how it was elicited.) A defendant should not be described or implied to be guilty of a crime until convicted by a court or jury or until a plea agreement is accepted by a court. (In addition, a criminal defendant’s agreement to a plea bargain is not enough without court approval of the plea). This does not mean that a product cannot discuss these facts—but guilt cannot be asserted until there is a conviction, whether by trial or court-accepted guilty plea. The consequences for error in implementing this principle are magnified if a product is widely disseminated.

Where an individual has been found guilty at trial or pled guilty, reporting must also accurately reflect the charges (i.e. the specific criminal activities) on which an individual was found or pled guilty. It is important to note that this may be all, some, or none of the charges on which the individual was originally indicted. Analysts must research the outcome of the legal proceedings against individuals on whom they wish to report and verify that they have appropriately described the crime for which the individual was convicted.

Minimize the use of the term “allegedly” when you are citing evidence from a particular source. Instead, where possible, refer to the original source of information. There may be situations where it is difficult to identify the source or originator of a statement; in those situations, use the terms “allegedly” or “reportedly.” If an individual has been arrested, indicted, or convicted, use the most current, complete, timely, and accurate terms possible in describing his or her status. Cite the specific charges from the indictment or any admissions in the *court accepted* plea agreement.

Not all facts need to be described as allegations. For example, a fact-based report about a shooting does not require using the phrase “alleged shooting” if it is well-documented that a shooting took place. The “allegation” requirement only applies when tying a suspect to the shooting (the “alleged shooter”). Note, too, that an exception to this rule is justified for individuals who were killed (or killed themselves) during the conduct of a particular act of violence or criminal activity. Because the individual was killed during the commission of the violent or criminal activity—and therefore cannot be charged, tried, and accurately described in

terms of the outcome of those proceedings—reports may describe the individual actor’s reasonably certain involvement in the violent or criminal activity without requiring terminology indicating that this involvement remains merely an allegation.

One area where this principle frequently arises is the characterization of U.S. Persons as “terrorists” or “violent extremists”; this is appropriate only if there is sufficient evidence stated in the product to support the conclusion. In deciding whether it is appropriate to refer to an individual or group by using one of these terms, use the term that is best supported by the intelligence and other information available. (If applicable and relevant, you may also state that an individual or group: has been (1) Designated as a “Specially Designated Global Terrorist” under Executive Order 13224; or (2) Designated as a Foreign Terrorist Organizations (FTO) under the Immigration and Nationality Act; or (3) Placed on the “Terrorist Exclusion List” under Section 411 of the USA PATRIOT ACT of 2001; or (4) Placed on the “Specially Designated Nationals List” pursuant to 31 C.F.R. 500.306.)

The Due Process Principle in Action: Sample Problems and Solutions

<u>Problem: Original Text</u>	<u>Solution: Revised Text</u>
(U//FOUO) The identified individual was able to enter the station from an unlocked back door, but was subsequently apprehended by the police officers without incident. The individual was armed with a handgun when the police took him into custody.	(U//FOUO) The identified individual was allegedly/reportedly able to enter the station from an unlocked back door, but was subsequently apprehended by the police officers without incident. The individual was allegedly armed with a handgun when the police took him into custody.
(U//FOUO) According to court documents, Madison, Wisconsin police arrested Lang for reckless endangerment after he discharged his .38-caliber handgun from a motel room in which he was staying into an unoccupied room across the hall. Upon his arrest, Lang told police that he had a gun “to lay out abortionists because they are killing babies.”	(U//FOUO) According to court documents, Madison, Wisconsin police arrested Lang for reckless endangerment after he allegedly discharged his .38-caliber handgun from a motel room in which he was staying into an unoccupied room across the hall. Upon his arrest, Lang allegedly told police that he had a gun “to lay out abortionists because they are killing babies.”

Hot-button terms (use suggests that the product should be evaluated for compliance with this principle):

- “terrorist”
- “violent extremist”
- “perpetrator”

5. THE *RELIGIOUS DEBATE PRINCIPLE*: AVOID TAKING PART IN A RELIGIOUS DEBATE BY USING RELIGIOUS TERMS IN A NON-NEUTRAL WAY

Avoid using religious terms that are subject to interpretation or have multiple meanings. Using such terms may legitimize the interpretation favored by a violent faction, or inappropriately engage DHS in an ongoing debate about the meaning accepted by the entire religion.

For example, the terms “jihad,” “jihadi,” and “jidahist” are terms with various meanings, subject to ongoing debate within Muslim communities of faith. Violent extremists certainly use the terms to refer to what they believe is a duty to conduct their terrorist activities, but others use them to mean a peaceful striving towards righteousness. “In Arabic, jihad means ‘striving in the path of God’ and is used in many contexts beyond warfare.”⁶ Indeed, anti-terrorists sometimes couch their opposition to terrorism by stating that it is not truly jihad, because it is unrighteous. Using the term “jihad” as synonymous to terrorism tends to ratify the violent extremists’ interpretation, lending it legitimacy. The use of these words by the U.S. government, attaching a violent gloss, may appear to denigrate Islam and erroneously label its mainstream practice as violent. Therefore, avoid using these terms altogether, as a general principle.

However, if such a term must be used analysts must make every effort to illustrate that DHS is merely reporting use of the term in that manner. For example, where necessary, reporting may include quotes from violent extremists characterizing their activities as “jihad,” and this should be indicated as a quote, both by direct association of the individual or group with the statement and by punctuating the reporting of the statement as a quotation. Wherever possible, reporting that must use this type of terminology should also include appropriate modifiers necessary to make clear why DHS is interested in its use; for example, “violent jihad” is preferred over simply referring to “jihad,” as DHS interest is only triggered if the term is used to imply a violent act.

Likewise, avoid use of the terms “Islamic” or “Muslim” as adjectives to describe terrorists, violent extremists, or other criminal individuals or groups. Use of these terms provides Al Qai’da, its followers, and other terrorist organizations with the legitimacy they seek by giving them the appearance of being representatives of the religion rather than representatives of their own violent belief system. If the terms “Islamic” or “Muslim” are necessary in certain situations to provide context for an event described in a product, more descriptive language should be used to make clear the relevance of the term to the product.

More broadly, use of the term “fundamentalist” should be avoided in DHS products; the term is generally used to denote more traditional or conservative adherents of a religion and is commonly used in reference to religious organizations and individuals with no link to violence or criminality. The term should never be used as a synonym for “terrorist” or “violent extremist.”

⁶ National Counterterrorism Center, *Words that Work and Words that Don't: A Guide for Counterterrorism Communication* (2008).

The Religious Debate Principle in Action: Sample Problems and Solutions

<u>Problem: Original Text</u>	<u>Solution: Revised Text</u>
(U//FOUO) On or about 23 August 2009, LaRose traveled to Europe with the intent to live and train with jihadists. LaRose was charged with recruiting men online to wage violent jihad abroad, recruiting women online to provide logistical support, soliciting funds online for terrorist organizations, and conspiracy to commit the act of murder outside the United States.	(U//FOUO) On or about 23 August 2009, LaRose traveled to Europe with the intent to live and train with violent extremists. LaRose was charged with recruiting men online to engage in violence abroad, recruiting women online to provide logistical support, soliciting funds online for terrorist organizations, and conspiracy to commit the act of murder outside the United States.
<u>Problem: Original Text</u>	<u>Solution: Revised Text</u>
(U//FOUO) On 27 August 2014, ISIS jihadists captured a Syrian Army air base and executed 250 members of the Syrian government force, who had surrendered after a brief firefight. ISIS is an Islamic extremist group that formed in response to the Syrian civil war, issued a statement threatening to continue attacking in Syria and Iraq until Syrian President Assad was deposed and a fundamentalist government compliant with Sharia law was established.	(U//FOUO) On 27 August 2014, violent extremists associated with the terrorist and paramilitary group ISIS captured a Syrian Army air base and executed 250 members of the Syrian government forces, who had surrendered after a brief firefight. ISIS, which formed in response to the Syrian civil war, is attempting to re-establish the caliphate (Islamic state), subsequently issued a statement claiming that the attacks would continue until Syrian President Assad was deposed and a government that comported with ISIS's interpretation of Islam was established in Syria and Iraq.

Hot-button terms (use suggests that the product should be evaluated for compliance with this principle):

- “Islamic extremist,” “Islamic terrorist,” “Islamist”
- “Muslim extremist,” “Muslim terrorist”
- “Sunni extremist,” “Shia extremist”
- “Radical Islam,” “Radical Muslim”
- “Jihad,” “Jihadi,” “Jihadist”
- “Fundamentalist”

6. THE *GUILT-BY-ASSOCIATION PRINCIPLE*: DON'T IMPLICATE MANY IN THE BAD CONDUCT OF A FEW

Do not attribute violent or other criminal acts of one or a limited number of a group's members to an entire group unless: (1) the group claims responsibility for the act; (2) the group openly advocates violent or other criminal acts in a manner that should be known to all of its members; (3) the U.S. government has *publicly* indicated that the group is connected to a terrorist organization,⁷ or (4) the group has been convicted as an organization operating primarily for criminal purpose or by criminal means.

Avoid stating that someone is connected to a group or organization engaged in some violent or other criminal activity unless you provide express support for that conclusion in the product. (Include a statement of and citation to the evidence that establishes the nature of the relationship. If the information regarding the nature and extent of the relationship was derived from another product/source, that product/source must be identified and cited within the product and made available for review. See *Clarity of Source Principle*.)

What *may not* be reported:

Individual members of a group do not become a proper subject for reporting simply because of their membership in the group in which one or a limited number of a group's *other* members engage in violent or other criminal acts. Some groups have violent extremist factions that engage in violent or other criminal acts. If reliable evidence indicates that an individual member of the group advocates or engages in the same violent or other criminal activities as members of a rogue faction of the group, this is a proper basis for reporting on that member—but is not a sufficient basis to report on the group as a whole.

The participation in violent or other criminal activity by some members of a group does not warrant reporting on the group's speeches, recruitment efforts, fundraising activities, associations by other members of the group, or other groups that share a similar ideology.

What *may* be reported:

If reliable evidence exists to support attributing the acts of individual members to the entire group, the group can be labeled accordingly, provided the basis for the label is fully explained in the product. Reporting about individuals or groups should discuss any challenge in distinguishing members who facilitate or engage in violent or other criminal activities from other law-abiding members of the group. As noted above, even where it is appropriate, reporting must not cast aspersions on religious, ideological, or political speech or activity unless that activity or speech includes the advocacy of violent or other criminal activity.

In addition, when assessing the potential for violence or other criminal activity in the future (e.g. violence is planned but has not yet been carried out) by an individual or group, it is appropriate to include examples of past violent or criminal activity. Furthermore, a predictive report should

⁷ Such public documents include: (1) The list of "Specially Designated Global Terrorists" (as designated pursuant to Executive Order 13224); (2) the list of Foreign Terrorist Organizations (FTO) (as designated pursuant to the Immigration and Nationality Act); (3) the "Terrorist Exclusion List" (as designated pursuant to Section 411 of the USA PATRIOT Act of 2001); and (4) the "Specially Designated Nationals List" (as designated pursuant to 31 C.F.R. § 500.306).

include relevant information to establish a well-supported and reasonable threat of violent or other criminal activity by a group, and the report must clearly support the assessment and appropriately characterize the reliability of supporting information. (See also the *Violence Principle* above.)

The Guilt by Association Principle in Action: Sample Problems and Solutions

<u>Problem: Original Text</u>	<u>Solution: Revised Text</u>
(U//FOUO) The militia extremist movement has been rife with internal turmoil since its creation, primarily stemming from disagreements among its leaders over its mission, focus, and training. As a result, new militia factions commonly form, disband, or change names in a short period of time. Even so, militia extremists maintain the ability to organize meetings and training with a particular militia extremist group and to network with other militia extremist groups in neighboring states. Furthermore, they are still able to instigate and support violence that targets government officials, institutions, and facilities in the United States.	(U//FOUO) The larger militia movement and its violent fringe element have been rife with internal turmoil from their inception, primarily stemming from disagreements among its leaders over mission, focus, and training. As a result, new militia factions commonly form, disband, or change names in a short period of time. Militia members maintain the ability, however, to organize meetings and train with a particular militia group and to network with other militia groups in neighboring states. Some violent militia extremist groups and individuals are still able to instigate and support violence that targets government officials, institutions, and facilities in the United States.

Hot-button terms (use suggests that the product should be evaluated for compliance with this principle):

- “affiliated with”
- “connected to”
- “related to”
- “associated with”
- “ties to”

7. THE *CLARITY-OF-SOURCE PRINCIPLE*: ACCURATELY CHARACTERIZE AND SEPARATE SOURCES’ CONCLUSIONS FROM YOUR OWN

A statement in the text of a report must be consistent with the cited sources. Further, where a product analyzes and reaches judgments based on information obtained from a third party (or multiple sources), the product should clearly identify what the third-party source “alleges” and what I&A “concludes” after analyzing the information. The *Clarity-of-Source Principle* ensures that reports are properly characterizing what is said in the underlying sources and helps separate the observations and conclusions by sources from I&A’s analytical judgments, and also accurately characterizes the reliability of the sources and the confidence in the analytical judgments.⁸

⁸ As noted above in footnote 5, this is also required by the standards set out under ICD 203.

What *may not* be reported:

1. Facts that are not supported by the cited authorities/sources.
2. Conclusions that do not reflect reasonable analytical judgments based on cited authorities/sources.
3. Products that do not clearly distinguish between facts and opinions from third-party authorities/sources and I&A assessments based on those facts.

What *may* be reported:

1. Facts that are supported by the cited authorities/sources.
2. Conclusions that do reflect reasonable analytical judgments based on cited authorities/sources.⁹
3. Products that clearly distinguish between facts and opinions from third-party authorities/sources and I&A assessments based on those facts.

The Clarity of Source Principle in Action: Sample Problems and Solutions

<u>Problem: Original Text</u>	<u>Solution: Revised Text</u>
(U//FOUO) Anti-abortion extremists remain willing and capable to use violence against abortion doctors and clinics since the murder of abortion doctor George Tiller in May 2009.	(U//FOUO) It is I&A's assessment that abortion providers remain a target of violence by some anti-abortion extremists. Our concern is that successful acts of violence, such as the murder of abortion doctor George Tiller in May 2009, may serve as inspiration for similar acts in the future.

8. THE ANTI-CONVEYOR BELT PRINCIPLE: CIVIL RIGHTS ISSUES ARE NOT NECESSARILY CURED BY ATTRIBUTION

If the language used in a product is problematic from a civil rights or civil liberties perspective, the attribution of that language to another agency or source does not typically cure the problem. For example, if a third-party source (e.g., foreign intelligence, news media, or other third party) makes unsupported conclusions about individuals or groups (e.g., referring to a group as "terrorist" without appropriate factual support), simply citing the fact to the third-party source does not fix the problem.

If third-party sources use vague or inappropriate terminology, analysts should consult applicable lexicons to determine whether the source has a definition for the term it uses that can be cited that is not objectionable to DHS. If there is no known definition available from the source, analysts should seek to obtain additional information from the source to substantiate the use of the term. If the term is important to the overall report, and it is not feasible to obtain additional information from the source, the analyst should identify the statement or term as originating with the source and use quotations and appropriate citations to make clear that the language being

⁹ When relying upon open source information, analysts should also take into consideration that news organizations often rely upon a single source, and their stories may then be reported in multiple secondary sources without direct attribution. This may give the appearance of widespread acceptance of a particular "fact" actually attributable to only one source.

used is derived from the third-party source and is not DHS language. Under these circumstances, the analyst will also need to provide factual background to support the fact that we are using the term in a manner that is within the DHS mission (i.e., tying the use of the term to violent or other criminal activity). This may require the analyst to limit what is relayed about the third-party source's conclusions.

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